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SECURITIES AND EXCHANGE COMMISSION
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

MATTHEW WADE BEASLEY; BEASLEY
LAW GROUP PC; JEFFREY J. JUDD;
CHRISTOPHER R. HUMPHRIES; J&J
CONSULTING SERVICES, INC., an Alaska
Corporation; J&J CONSULTING SERVICES,
INC., a Nevada Corporation; J AND J
PURCHASING LLC; SHANE M. JAGER;
JASON M. JONGEWARD; DENNY
SEYBERT; ROLAND TANNER; LARRY
JEFFERY; JASON A. JENNE; SETH
JOHNSON; CHRISTOPHER M. MADSEN;
RICHARD R. MADSEN; MARK A.
MURPHY; CAMERON ROHNER; AND
WARREN ROSEGREEN;

Defendants; and

THE JUDD IRREVOCABLE TRUST; PAJ
CONSULTING INC; BJ HOLDINGS LLC;
STIRLING CONSULTING, L.L.C.; CJ
INVESTMENTS, LLC; JL2 INVESTMENTS,
LLC; ROCKING HORSE PROPERTIES,
LLC; TRIPLE THREAT BASKETBALL,
LLC; ACAC LLC; ANTHONY MICHAEL
ALBERTO, JR.; and MONTY CREW LLC;

Relief Defendants.

Case No.: 2:22-cv-00612-CDS-EJY

Judge: Cristina D. Silva

Magistrate Judge: Elayna J. Youchah

**PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S,
DEFENDANT CHRISTOPHER
MADSEN'S, AND RECEIVER'S
STIPULATION CONCERNING
LIVING EXPENSES**

1 **WHEREAS**, on June 29, 2022, Plaintiff United States Securities and Exchange
2 Commission (“SEC”, “Commission”, or “Plaintiff”) filed its Amended Complaint in this matter,
3 alleging violations of the registration and/or antifraud provisions of the federal securities laws by
4 Defendants, and the receipt of ill-gotten proceeds of such violations by Relief Defendants. (Dkt.
5 No. 118.)

6 **WHEREAS**, on June 29, 2022, the Commission filed a Motion to Amend Preliminary
7 Injunction Order to extend the existing preliminary injunctive relief and asset freeze to those
8 defendants added in the Commission’s Amended Complaint. (Dkt. No. 119.)

9 **WHEREAS**, on June 29, 2022, the Commission filed a Motion to Amend Receivership
10 Order to extend the existing receivership order to include those defendants added in the
11 Commission’s Amended Complaint. (Dkt. No. 120.)

12 **WHEREAS**, on July 29, 2022, the Court issued its Order Amending Preliminary
13 Injunction and Asset Freeze Order, which, *inter alia*, extended the asset freeze imposed by the
14 Court on April 13, 2022 to those defendants added in the Commission’s Amended Complaint.
15 (Dkt. No. 206.) The Court’s Order provided for “an allowance for necessary and reasonable
16 living expenses to be granted only upon good cause shown by application to the Court with
17 notice and an opportunity for the Commission to be heard.”

18 **WHEREAS**, on July 29, 2022, the Court issued its Order Amending Receivership Order,
19 which, *inter alia*, extended the receivership previously imposed by the Court to the assets of
20 those defendants added in the Commission’s Amended Complaint. (Dkt. No. 207.)

21 **WHEREAS**, at the hearing before the Court on July 25, 2022, the Court directed the
22 parties to discuss any exceptions to the asset freeze regarding living expenses and so as to ensure
23 the scope of the preliminary injunction was tied to the underlying Ponzi scheme.

24 **WHEREAS**, on August 4, 2022 the Court entered an order further amending the
25 Preliminary Injunction and Asset Freeze Order exempting certain assets of Defendant
26 Christopher Madsen from the order. (Dkt. No. 229.)
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1 **WHEREAS**, counsel to the Commission, Defendant Christopher Madsen, and the
2 Receiver have reached the following agreement as to an allowance for living expenses, and
3 jointly provide this proposed agreement for approval by the Court:

- 4 1. The Boulder Dam Credit Union account ending in 2001 (the “Boulder Dam
5 Checking Account”) held in the name of Christopher Madsen shall be unfrozen to
6 allow Defendant Christopher Madsen to pay living expenses and hold going-
7 forward, earned income unconnected to the conduct alleged in the Complaint;
- 8 2. Defendant Madsen must provide to counsel to the Commission and to the
9 Receiver, without further request or subpoena, the monthly account statements of
10 the Boulder Dam Checking Account for review and inspection by no later than
11 the 5th of each month this stipulation is in effect. The Boulder Dam Checking
12 Account statements shall be provided to counsel to the Commission by email to
13 Casey R. Fronk (fronkc@sec.gov) and Tracy S. Combs (combst@sec.gov); and to
14 the Receiver by email to Kara Hendricks (hendricks@gtlaw.com) as counsel for
15 the Receiver and to Geoff Winkler (geoff@americanfiduciaryservices.com).

16 Dated: August 23, 2022

**U.S. SECURITIES AND EXCHANGE
COMMISSION**

17 /s/ Casey R. Fronk
18 TRACY S. COMBS
19 CASEY R. FRONK
20 Attorneys for Petitioner U.S. Securities and
21 Exchange Commission
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23
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25
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27

1 Dated: August 23, 2022

WILEY PETERSON

2 */s/ Jonathan D. Blum*

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16 *Attorneys for Defendant Christopher Madsen*

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1 Dated: August 23, 2022

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2 /s/ Kara B. Hendricks

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23 *Attorneys for Receiver Geoff Winkler*

24 IT IS SO ORDERED:

25

CRISTINA D. SILVA

26 UNITED STATES DISTRICT JUDGE

27 DATED: _____